| 1 | MELINDA HAAG (CABN 132612) United States Attorney |
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| 2 | J. DOUGLAS WILSON (DCBN 412811) Chief, Criminal Division |
| 3 4 | MATTHEW A. PARRELLA (NYBN 2040855) |
| 5 | MATTHEW A. PARRELLA (NYBN 2040855) Assistant United States Attorney 150 Almaden Boulevard, Suite 900 San Jose, California 95113 |
| 6 | 150 Almaden Boulevard, Suite 900 San Jose, California 95113 |
| 7 | Telephone: (408) 535-5042 FAX: (408) 535-5066 |
| 8 | matthew.parrella@usdoj.gov |
| 9 | Attorneys for United States of America CR-13-00703-LHIC |
| 10 | UNITED STATES DISTRICT COURT |
| 11 | NORTHERN DISTRICT OF CALIFORNIA |
| 12 | SAN JOSE DIVISION |
| 13 | UNITED STATES OF AMERICA, UNITED STATES' MOTION TO UNSEAL |
| 14. |) DOCUMENTS AND [PROPOSE D] ORDER Plaintiff, |
| 15 | į (|
| 16 | V. |
| 17 | ADRIAN BALTAGA, GHEORGHE BALTAGA, DINDER SEAL |
| 18 | |
| 19 | The covernment handles maying this Covert to suggest the items and another fallessing |
| 20 | The government hereby moves this Court to unseal the items under the following |
| 21 | dockets: |
| 22 | CR 12-90147 MISC – HRL |
| 23 | CR 12-90268 MISC – HRL |
| 24 | CR 12-90372 MISC – PSG |
| 25 | CR 12-90373 MISC – PSG |
| 26 | CR 12-90434 MISC – HRL |
| 27 | CR 12-90503 MISC – PSG |
| 28 | CR 12-90592 MISC – HRL |
| | MOTION TO UNSEAL DOCUMENTS CR-13-00703 LHK |

| 1 | CR 12-90593 MISC – HRL |
|----|----------------------------------|
| 2 | CR 12-90676 MISC – NMC |
| 3 | CR 12-90712 MISC – HRL |
| 4 | CR 12-90809 MISC – PSG |
| 5 | CR 12-90809-renewal – PSG |
| 6 | CR 12-90832 MISC – HRL |
| 7 | CR 12-90832 MISC – Extended PSG |
| 8 | CR 12-90834 MISC – HRL |
| 9 | CR 13-70237 – HRL |
| 10 | CR 13-70238 – HRL |
| 11 | CR 13-90108 MISC – PSG |
| 12 | CR 13-90108 MISC-extension – NMC |
| 13 | CR 13-90108 MISC-extension – HRL |
| 14 | CR 13-90108 MISC-extension – HRL |
| 15 | CR 13-90236 MISC – HRL |
| 16 | CR 13-90284 MISC – PSG |
| 17 | CR 13-90284 MISC-extension – HRL |
| 18 | CR 13-90284 MISC-extension – HRL |
| 19 | CR 13-90387 MISC – HRL |
| 20 | CR 13-90677MISC – PSG |
| 21 | CR 13-90681MISC -PSG |
| 22 | CR 13-90736 MISC –PSG |
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MOTION TO UNSEAL DOCUMENTS CR-13-00703 LHK

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The basis for this application is that the covert phase of this investigation is complete, the defendants have been indicted, and the government needs to complete discovery obligations under Rule 16. In order to complete said obligations, the government needs to disclose the above-referenced items. The materials no longer need to remain sealed to the public.

MELINDA HAAG

United States Attorney

MATTHEW A. PARRELLA

Assistant United States Attorney

DATED: January 23, 2014 Respectfully submitted,

MOTION TO UNSEAL DOCUMENTS CR-13-00703 LHK

1 [PROPOSED] ORDER 2 3 Based upon the motion of the government and for good cause shown, IT IS HEREBY ORDERED that the items under the following dockets, as well as this application and order, be 4 5 UNSEALED: 6 CR 12-90147 MISC - HRL 7 CR 12-90268 MISC - HRL 8 CR 12-90372 MISC – PSG 9 CR 12-90373 MISC - PSG 10 CR 12-90434 MISC - HRL 11 CR 12-90503 MISC – PSG 12 CR 12-90592 MISC - HRL 13 CR 12-90593 MISC - HRL 14 CR 12-90676 MISC - NMC 15 CR 12-90712 MISC – HRL 16 CR 12-90809 MISC - PSG 17 CR 12-90809-renewal – PSG 18 CR 12-90832 MISC – HRL 19 CR 12-90832 MISC - Extended -- PSG 20 CR 12-90834 MISC - HRL 21 CR 13-70237 - HRL 22 CR 13-70238 - HRL CR 13-90108 MISC - PSG 23 24 CR 13-90108 MISC-extension - NMC 25 CR 13-90108 MISC-extension – HRL 26 CR 13-90108 MISC-extension – HRL 27 CR 13-90236 MISC - HRL 28 CR 13-90284 MISC - PSG

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CR 13-90284 MISC-extension - HRL CR 13-90284 MISC-extension - HRL CR 13-90387 MISC - HRL CR 13-90677MISC - PSG CR 13-90681MISC -PSG CR 13-90736 MISC -PSG IT IS SO ORDERED. United States District Court Judge

MOTION TO UNSEAL DOCUMENTS CR-13-00703 LHK